



November 18, 2022

Hon. Jennifer L. Rochon
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007

VIA ECF ONLY

Re: *Coker v Goldberg & Associates P.C.* 1:21-cv-1803-JLR
Plaintiff's Response in Opposition to Defendants' Request for Stay of Proceedings

Your Honor:

I do not mean to be insensitive here. It is not my practice or habit to oppose requests for medical leave or the like. However, due to the vague nature of the defendants' letters I conducted some research into the individual and clinic purporting to support the defendant's requests.

The signatory on the letter is "Katherine M. Zagone, ND" from "Gentera Center for Precision Medicine." Attached is her bio from that entity's website (<https://genteramed.com/our-beverly-hills-team/katherine-zagone/>) that states that this person is a "Licensed Naturopathic Doctor" whose title they list as "Medical Director, Sexual Wellness Expert." WebMD defines a "Naturopathic medicine" as "a system that uses natural remedies to help the body heal itself. It embraces many therapies, including herbs, massage, acupuncture, exercise, and nutritional counseling." Neither Ms. Zagone nor the center is listed on the California Department of Consumer Affairs license search of physicians at <https://search.dca.ca.gov/results>. The center's website (<https://genteramed.com/>) advertises, "Our therapies work with your body to replenish energy and enhance, revitalize and rejuvenate your bodily processes. We offer advanced aesthetic services for anti-aging and our precision therapies can help with weight loss, anxiety, low energy, depression, low libido, and more..."

Plaintiff's counsel respectfully submits that Defendants' proffer does not qualify as a medical note supporting Defendants' request for a 60 day stay of proceedings. Plaintiff asks that their motion to stay proceedings be denied and that the order to appear at deposition December 7 stand.

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Sincerely,



Penn Dodson, Esq.

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encl: Exhibit 1 - Katherine M. Zagone Bio
Exhibit 2 – Gentera Services